REMARKS

Claims 1 - 15 and 29-31 are in the application.

The specification has been amended to provide a more descriptive title as suggested by the Examiner.

The claims have been amended to more particularly point out and distinctly claim applicant's invention. Claims 16-20 have now been cancelled, and new claims 29-31 have been added. Claims 21-28 were previously cancelled. The new claims are fully supported by the application as filed and introduce no new matter.

A certified copy of the priority document has previously been submitted.

Claims 1, 2, 14, 16, and 17 stand rejected under 35 U.S.C. 102(e) as being anticipated by the disclosure of U.S. Patent Application 2002/0141560 ("Khayatan"). This rejection is respectfully traversed, and reconsideration and withdrawal of this rejection are respectfully requested as applicable to the amended claims.

The Examiner states that regarding Claims 1 and 14, Khayatan discloses of a method to generate a group of entities from a plurality of participating entities (Abstract; Para. 0041; system and method of establishing a group of individuals with mutual interests) comprising of one of said participating entities expressing by indication which others of said participating entities they wish to meet (Para. 0041, 0042; contacting and inviting other people to join the group), selecting to be a first member of the group an entity which has indicated at least one other of said participating entities it wishes to meet (Para. 0042; "Group Initiator" initiates the group), adding a new entity to the group by selecting said new entity from the set of indications of the last member added to said group (Para. 0070; "Invite" feature allows other group members to invite people to join that group).

Further, with respect to Claim 16, the Examiner states that Khayatan discloses a system to generate groups to meet for the purpose of enabling participating entities to meet others of said participating entities more effectively (Abstract; "Group Establishment System") comprising of a computer readable storage medium (Fig. 1 and 2; Para. 0044 and 0045; describes the use of a database), linkages to said participating entities by input/output devices (Fig. 1 and 2; Para. 0044 and 0045; the use of various devices that can access the main program), wherein the particulars of said participating entities and indications can be fed in and stored in the computer readable storage medium and resultant groups generated posted to the entities via the same input/output devices (Fig. 1 and 2; Para. 0044, 0045, 0092 —0096; group members enter personal data to the database, along with events, activities, etc.), and computer programming stored on the storage medium (Para. 0045; program located in database).

The Examiner also states that regarding Claims 2 and 171 Khayatan discloses all the limitations of Claims 1 and 16. The Examiner further states that Khayatan discloses that the set of indications of an entity are the set of other entities that said entity indicated it is interested in meeting (Para.0041, 0042, 0043; invitees join the group if they desire to join).

With respect to Claim 12, the Examiner states that Khayatan discloses all the limitation of Claim 1 as stated above. Khayatan further discloses that the entities under consideration are already pre-selected for in terms of having already indicated a common time (Para. 0080; allows individuals to indicate what time period periods they are interested in) and a common place to meet (Para. 0077; determine what geographical scope the group will have).

Applicant respectfully submit that Khayatan does not anticipate the presently claimed invention.

The Examiner states that Khayatan discloses a method to generate a group of entities from a plurality of participating entities.

The applicant respectfully disagrees as follows:

The teachings of Khayatan disclose a method of establishing a group of individuals with mutual interests by the initiatives of the Group Initiator who invites potential members. The members get familiarized with each other only after joining the group. The members can also leave the group if they do not find compatibility with others (Please refer to Para 0042 and 0043 of Khayatan's application). Therefore, it is clear that Khayatan's group of entities is not established "from a plurality of participating entities" and thus does not meet this limitation of Claim 1.

By way of further clarification, in the Applicant's method, participating entities are entities in a networking club that are waiting to be selected into groups by indication by other members or be selected to be the first member of a link of indications of a new group. Participating entities as such become familiar with each other and form "link of indications" based on indication of interests (Please refer to Page 2 lines 1 - 2 and Page 3, lines17 -18 of the Applicant's specification). The links formed lay the foundation for indication by added entities. The members in this case participate in indicating and generating more links of interest. The time point at which the entities/members familiarize with each other resulting in the group bonding differentiates the method of establishing a group in the Applicant's and Khayatan's systems. This is totally contrary to any teaching or suggestion in the reference.

The Examiner also states that Khayatan discloses a method comprising one of the said participating entities expressing by indication which others of said participating entities they wish to meet.

However, the Applicant respectfully disagrees as follows:

The teachings of Khayatan disclose a method where the Group Initiator invites potential members to join the group, which appears to be an authoritative "invitation" and selection of all members by the Group Initiator in association with the system (Please refer to Para 0042 in Khayatan). The Group Initiator has the sole authority.

In the Applicant's claimed method, the method is fashioned in the form of a link (Please refer to Page 2, line 22, and Page 3 lines 1 - 2 of the Applicant's specification), where each entity of the networking club is free to indicate any other participating entity. Equal opportunity is provided to all the member entities for the establishment of links of indications leading to smaller groups as well. Accordingly, it is clear that the reference does not in any way anticipate the express language, nor even the spirit thereof, as stated in Claim 1, subclause (a).

The Examiner also states that Khayatan discloses a method of selecting to be a first member of the group an entity which has indicated at least one other of said participating entities it wishes to meet.

The Applicant respectfully disagrees as follows:

According to Khayatan, the Group Initiator is the leader of the group and initiates it. The Group Initiator's responsibility in the group generation is to populate the group by inviting members to join (Please refer to Para 0042 of Khayatan's application).

In contrast, according to the Applicant, the first member is a participating entity of the networking club which starts the group formation and is not considered as the leader of the group or the networking club. The first member's responsibility in the group generation is to add the second member through "indication" (Page 3 lines 13 - 15 of the Applicant's specification). Accordingly, the express language of Claim 1, subclause (b) is also clearly not anticipated by the reference.

The Examiner also states that Khayatan discloses a method where a new entity is added to the group by selecting the new entity from the set of indications of the last new member added to the group.

The Applicant respectfully disagrees as follows:

According to Khayatan, the Group Initiator invites members to join the group. Though the Invite feature allows group members to join the group, the members' requests have to be approved by the Group Initiator. Hence, the Group Initiator has the sole authority in inviting members to join the group (Please refer to Para 0042 Group Initiator and to Para 0070 Invite feature in Khayatan). Stated otherwise, in the Applicant's method, the selection of entities into groups is the result of following a chain of indication of interest of the participating members of the club and every entity gets a chance to select other members by indication immediately after joining the club. The Applicant's system acknowledges every added member's "set of indications" with equal priority (Please refer to Page 3 lines 13 -15 of the Applicant's specification). Accordingly, the express language of Claim 1, subclause (c) is also clearly not anticipated by the reference.

Since the limitations of the claims are not completely met by the disclosure of Khayatan, the presently claimed invention is not anticipated thereby, and reconsideration and withdrawal of the rejection are respectfully requested for this reason.

Claim 15 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Khayatan as applied to Claim 1. This rejection is also respectfully traversed, and reconsideration and withdrawal of the rejection are respectfully requested as applicable to the amended claims.

The Examiner states that regarding Claim 15, Khayatan discloses all the limitations of Claim 1 as stated above. The Examiner further states that it is commonly

known in the art that members of a group or community can also be corporations, people, and a combination of both. The Examiner further states that people represent corporations since they function through the acts of the people in control and therefore, can become members of a group or community through representation by a corporate employee.

As argued above, Khayatan fails to disclose all the limitations of Claim 1. Thus, whether or not the Examiner's statement that members of a group or community can be corporations, individuals or a combination of the two is correct, Khayatan cannot disclose or suggest all the limitations of the present invention as claimed in Claim 15, and thus Claim 15 is not obvious over Khayatan. The rejection should be withdrawn for this reason.

Claims 3 and 19 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Khayatan as applied to Claims 1 and 16, and further in view of United States Patent Application 2003/0208727 A1 ("Mortensen"). This rejection is also respectfully traversed, and reconsideration and withdrawal of the rejection are respectfully requested as applicable to the amended claims.

The Examiner states that regarding Claims 3 and 19, Khayatan discloses all the limitations of Claims I and 16 as stated above. The Examiner admits, however, that Khayatan does not specifically disclose a grouping system comprising of repeatedly adding new members until at least one indication of the set of indications of the last new member added to said group includes one of the current members of the group.

The Examiner further states that Mortensen discloses a method, apparatus, and a computer-readable medium enabling a computer to perform such method of grouping failed paths of an integrated circuit design into failed path sets (Para. 0001, 0013). The Examiner also states that if such a node pattern (converted failing path) is already part of

the node pattern set and no further node patterns are remaining, the grouping of failed paths into the failed path set is completed (Fig. 5; Par. 0046 —0048). The Examiner concludes that it would be obvious to one skilled in the art to verify whether an entry to a group has already been entered into the group to eliminate the redundancy of having duplicate entries of that entity. The Examiner also states that, this method can be modified to eliminate the requirement to check for other entries once the first redundant entry is found since continuing to sort through all possible paths would take up large amounts resources (Para. 0013 and 0014).

The Examiner's conclusions are not correct. The Applicant respectfully disagrees with the Examiner as follows:

According to the teachings of Mortensen, the grouping of failed paths into the failed path sets stops when a node pattern is already part of the node pattern set and there are no more node patterns remaining. It appears that this method focuses on sorting the node patterns exhaustively and including them in the node pattern set, so that no node pattern remains ungrouped (Please refer to Para 0046 – 0048 of Mortensen's application).

In contrast, in the presently claimed method of adding new members into the group Applicant does not focus on exhaustively adding all the participating members into the group. In the presently claimed invention, the system checks the set of indications of the last new member added to the group. In case of the last new member having multiple indications and in the event of one of the indications being a current member of the group, the addition of members into the group will stop (Please refer to Page 3 lines 19 - 22 of the Applicant's specification). The other indications of the last new member will not be added into the group even if they are in the list of participating entities. Moreover, the verification of whether a new entity to be added has already been added

to the group is for stopping the group generation process. Hence, the Applicant's system is clearly not obvious in light of the teachings of Mortensen and Khayatan. Reconsideration and withdrawal of the rejection entered over Khayatan in view of Mortensen are respectfully requested for these reasons.

Claims 4, 7, 13, 18, and 20 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Khayatan as applied to Claims I and 16 above, in view of Mortensen, and further in view of United States Patent Publication 2003/0167344 Al ("Danso"). This rejection is also respectfully traversed, and reconsideration and withdrawal of the rejection are respectfully requested as applicable to the amended claims.

The Examiner states that regarding Claims 4, 7, 13, 18, and 20, Khayatan, in view of Mortensen discloses all the limitation of Claims 1 and 19 as stated above. The Examiner admits that Khayatan in view of Mortensen does not specifically disclose using a look-ahead or look-back method of choosing which one of the set of indications to choose from the last new member where the look ahead or look back consists of N generations. The Examiner further states that Danso discloses of a method of organizing a multifunctional communications system beginning at a central entity and expanding further in a pyramidal structure, where the first entity connects with a first group of entities and the entities of the first group each are connected to other entities (Para. 0003; Fig. 1). The Examiner also states that Danso further discloses of the system where there is a predetermined number of communication levels from the central node and therefore allowing the system to validate the communication path to the last node (Para. 0015; Fig. 2). The Examiner states that this system and method allows a user to look at the network beginning at a certain node and determine which interlinking nodes to select to form a closed loop, or in the case of the current application a group of entities expressing interest in meeting the other (Para. 0015). The Examiner also states

that this system will also allow a user to look at the last node to be included in the group and traced backwards to the beginning. The Examiner concludes that it would be obvious to one skilled in the art to validate the communication path from the initial node to the final node of the group though the interlinking nodes in-between them. The Examiner also states that a predetermined number of levels or entities (Para. 0032) to be included in the group can be used to prevent the formation of very large groups and to minimize the use of available resources. The Examiner concludes that the look-back and look-forward will allow any user or entity to quickly determine which groups the user-selected nodes or entities are in since not all the requested entities will have the same interests.

The Examiner further states that regarding Claims 5, 6, 8, 9, 10, and 11, athe combination of Khayatan, in view of Mortensen and Danso, discloses all the limitations of Claims 1, 4, and 7 as stated above. The Examiner states that it is well known in the art that a group formed with N generations will consist of a new member and all the entities from the prior generation (N — 1) particularly within the communication and networking environments disclosed in Khayatan, Mortensen, and Danso. The Examiner also states that it is also well known in the art that the formation of such a group, which traces through interconnected entities or nodes where there is a limit on the number entities or nodes within a communication group, can combine both look forward and look back approaches to find the one entity that closes the network loop and completes the group. The Examiner notes that using the look-back and look-forward feature will allow any user or entity to quickly determine which groups the user-selected nodes or entities are in. The Examiner further notes that if one particular entity is one that was commonly traced with either the look-back, look-forward, or combined function, it satisfies the Mortensen criteria of closing the group.

The Applicant respectfully disagrees with the Examiner's conclusion as follows:

According to the teachings of Danso, the multifunctional communications system discloses interconnected nodes formed in the shape of a pyramid with gradually increasing nodes at each subsequent lower communication level (Please refer to Para 0002 of Danso's application). The communication levels in the system are predetermined so as to prevent the formation of very large groups and minimize the usage of available resources. The limiting of the communication levels also limit the total number of nodes in the levels, as the structure of the pyramid is regular and symmetrical and the number of nodes can be derived mathematically. It is also stated that it is obvious to one skilled in the art to validate the communication path from the initial node to the final node of the group through the interlinking nodes in-between them.

However, in contrast, according to the teachings of the Applicant, the look-ahead and the look-back methods are to systematically add the entities and hasten the process of group formation (Please refer to Page 3 lines 23 - 24 and Page 4 lines 14 - 17 of the Applicant's specification). Generally, predetermination of communication levels or nodes involves mathematical calculations, but no mathematical calculations are employed here in the look-ahead and look-back methods. Moreover, the Applicant's system does not disclose any communication path from the first entity to the last entity. The purpose of having a link of indications between the entities is to individually add them to the group (Please refer to Page 2 line 21 of the Applicants' specification). Once the entities are added to the group, the communication between them does not follow any fixed rule. Hence, the Applicant's system is clearly not obvious in light of the teachings of Khayatan in view of Mortensen and further in view of Danso.

Reconsideration and withdrawal of the rejection entered under 35 USC 103(a) over the combination Khayatan, Mortensen and Danso are respectfully requested for this reason.

Reconsideration and withdrawal of all rejections, and an early notice of allowance, are earnestly solicited.